## Response 1: ID ANON-U5JT-4XNR-M

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-10-25 11:36:21 Next steps Part A - Personal Details 1 Are you completing this form as an: Individual 2 Please provide your contact details below. Title: Mrs Name: Helen Harvey Job title (if relevant): Organisation (if relevant): Organisation representing (if relevant): Address line 1: Address line 2: Address line 3: Postal town: Wantage Post code: Telephone number: Email: Part B - Your comments

3 Please provide your comments below.

#### Your Comments:

We want regular activities at The Beacon DURING SCHOOL HOLIDAYS, when families need them most. This is a Community asset and has largely been ignored, it needs to become a much bigger part of the local community and not just for paid activities that you are going to make money from, but much more free or cheaper activities for a range of age groups.

For example during Autumn Half Term break 2024, there is a 1-hour arts and crafts session aged at 5-7 year olds and costs £10 (!), this isn't good enough, and it's far too expensive. Our teenagers are being forgotten, not engaged with and falling through the net and you are expecting families to justify spending £10 on a lame arts and crafts activity they could do themselves at home with recycled materials.

I want to see more forward thinking for safety on the streets. There needs to be a change in thinking from CARS FIRST, to cyclists and walkers, many families can not afford a car and need to walk their children to and from schools, many new families are located on the airfield and into Grove, there are no zebra crossing at the aeroplane roundabout and it is unsafe, much more needs to be done to make walking and cycling in this town a priority, there needs safer roads, crossings, speed bumps, more signage and much better conditions to encourage walking and cycling for cleaner greener Wantage but also to make this a safe option. Children have to currently wait a very long time in all weathers to safely cross the roads, it's not good enough, more needs to happen to keep our children safe.

Youth workers need to be PAID to help and work for The Sweatbox, more opportunities are needed for our teenagers in the area, more pool tables, indoor activities such as air hockey, basket ball, pool tables, gaming stations etc. Wantage needs to grow with the times, it is being stuck in a very old time and our youth are suffering. What is there for them to do locally? Unless wealthy families can afford to pay for them to go to sports activities, there really isn't any options.

UPDATE THE SKATE PARK!!!!!!!!!! It's a disgrace, it's dirty, old, tired and a mess. Skateboarding is now an Olympic sport, do we think we will be seeing any of our youth going with the facilities we have here? Spend some money, time and effort and upgrade this facility. Get a young company engaged to teach kids and use the facility.

Wantage Leisure Centre....BETTER is a terrible company, the entire place is now so dirty and out of date, i now do not use the gym and have stopped my daughters having swimming lessons here. It's in desperate need of refurbishing. We have to travel to Faringdon, Didcot and Abingdon for better facilities, Wantage needs health and wellness facilities to match the growth in community and this needs promises now following through.

The roads down Elizabeth Drive, Roman Way and other older area of Wantage all need repaving, these are badly damaged and in need of repair.

Car parking in Wantage has always been a nightmare, in 2014 it was raised as a major issue, this should now be raised higher as critical. The Beacon has now removed spaces, Sainbury's has also removed spaces and the town continues to grow. We need offsite parking and a bus service to transport people from The Air Field or Rugby Ground to support further growth in the area, we need Sainbury's to offer a multi-storey, anything, but the reduced car parking spaces is very difficult and needs sorting asap.

You can upload supporting evidence here: No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

### Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

The Neighbourhood Plan has taken a very long time to be adopted, many new people have moved to the area, and still the plan is to continue growing without necessary upgrades to community facilities, road safety, car parking, attracting names to our high street, a new supermarket, or upgrades to our roads

We can't keep accepting quietly what the local council are saying, we demand better, we want to stop being ignored and all the money going to upgrade Abingdon, Didcot and Faringdon. We are fed up and want our town to offer more to our growing community.

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

## Response 2: ID ANON-U5JT-4XNN-G

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-10-25 12:27:31 Next steps Part A - Personal Details 1 Are you completing this form as an: Individual 2 Please provide your contact details below. Title: Mr Name: **David James** Job title (if relevant): Organisation (if relevant): Organisation representing (if relevant): Address line 1: Address line 2: Address line 3: Postal town: Post code: Telephone number: Email: Part B - Your comments 3 Please provide your comments below. Your Comments: My family and have lived in Wantage for 20 years now, living in the same house and watch our children go through Charlton Village primary and then to

KA's. It does feel like the original, quiet Wantage is disappearing under the weight of new builds, traffic and modified car and bike exhausts.

I'm very glad this growth has lead to this opportunity and fund. I work in Abingdon and very much envy their sports centre, and improved offer in Wantage would be most welcome. My son enjoyed football for years and for years I would spend hours sliding around in the mud with the lights in winter, and improved outdoor fascility would also be welcome.

On a selfless level. Working in Abingdon the 419 is an scurge and really congested most mornings and afternoons. There must be a way to make a deal with the farmers to put a cycle line in, at least to steventon......built it any they will come!

This is a wonderful area to live. With great, (they should outstanding) Schools and massive amounts of opportunities for my children, we wouldn't want to be away else, it just needs a bit of TLC.

Kind regards
You can upload supporting evidence here: No file uploaded
4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.
What changes do you consider necessary for the plan to meet the basic conditions?:
You can upload supporting evidence here: No file uploaded
5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?
Public hearing
6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.
Yes, I request a public hearing
Public hearing
7 Please state your specific reasons for requesting a public hearing below:
Public hearing textbox:
It would be great to hear about the plans.
Finally
14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.
Other, please specify:

Thank you for this opportunity

Response 3: ID ANON-U5JT-4XN2-M Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-06 11:50:06 Next steps Part A - Personal Details 1 Are you completing this form as an: Individual 2 Please provide your contact details below. Title: Mrs Name: Jacqueline Edwards Job title (if relevant): Organisation (if relevant): Organisation representing (if relevant): Address line 1: Address line 2: Address line 3: Postal town: Post code: Telephone number: Email: Part B - Your comments 3 Please provide your comments below. Your Comments:

The plan mentions Manor Park as the main recreation area for the town. While there are tennis and bowling clubs the general facilities for children and to g people are extremely poor as are the public toilets.

Compared with Abingdon and Didcot parks, the play equipment is poor. Very little equipment is provided and this is mainly for younger children. There is nothing for older children (teenagers) to use. I suggest adding a skate park and bmx track to the area, separated from the play area.

The toilets are disgusting! There is one toilet which is always filthy and the floor swimming with water. We need a new toilet block with modern sanitary ware. We also need some space for little ones to be changed and dried after using the water sprays in the summer.

Finally we need more benches and seating for families to use. Given this is the only park/public space in our town I needs drastic improvement.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Wantage Leisure Centre requires total refurbishment or ideally replacement. Compared to leisure centres in Abingdon and Didcot this is not acceptable. I understand funding for this has been available for some time so the council needs to get on with this work.

We have many young families coming into the town and our leisure and play facilities are not good enough. S106 money must be used for improvements.

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

#### **Public hearing**

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

So that the public can question the plan and receive explanations as to decisions being made/proposed.

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

Response 4: ID ANON-U5JT-4XNA-3 Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-09 22:10:47 Next steps Part A - Personal Details 1 Are you completing this form as an: Individual 2 Please provide your contact details below. Title: Mr Name: James Hodgson Job title (if relevant): Organisation (if relevant): Organisation representing (if relevant): Address line 1: Address line 2: Address line 3: Postal town: Post code: Telephone number: Email: Part B - Your comments 3 Please provide your comments below.

Your Comments:

With respect to the "Plan E: Wantage Proposed Cycle Routes", there are a couple of oddities, especially relating to (4), that seems to come from the north, along Crabhill Lane, before heading southeast towards Lockinge.

Immediately after the turn to the southeast, the proposed cycleway goes through a farmer's field and is only currently designated as a footpath. Likewise, after the proposed cycleway passes through the Kingsgrove development, it crosses the Reading Road and immediately continues through another farmer's field.

In each case, there are simple diversions that would take bicycles along quiet roads, with the possible exception of Reading Road, meaning that there would be less agricultural land needing to be affected.

You can upload supporting evidence here: No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

Public hearing
6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.
I don't know
Finally
14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

Other, please specify:

You can upload supporting evidence here:

No file uploaded

### Response 5: ID ANON-U5JT-4XN9-U

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-16 18:05:56

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1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title: Mrs

> Name: Margaret

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

- 1. Cycling and pedestrian routes. Such routes should be made available along manor rd A338 to the ridgeway parking area. This extremely hazardous for pedestrians and cyclists.
- 2. There is no non hazardourdous route currently to the west of wantage along the Ickleton rd.
- 2. Land designation. The land to the south of willow lane currently mostly occupied by Wantage football club and King Alfred's academy sports field and land currently privately owned should be designated of recreational importance for the town.
- 3. Public access should be enabled to the manor brook perhaps at the bottom of the KA field. Suggested management to be given to letcombe brook project.

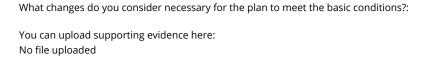
(Currently this is a neglected and much vandalised zone)

- 4. Pedestrianisation of town centre to be increased.
- 5. Current allotment areas to be maintained.
- 6. The new plantings in the town centre in planters and the more natural management of the park are to be commended.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.



5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

## Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

## Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

To ensure the comments have been listened to.

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

## Response 6: ID ANON-U5JT-4XN8-T

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-20 16:47:18

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1 7	-	$\mathcal{L}$	N2

Part A -	Persona	l Detail	2
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1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:



Name:

Job title (if relevant):

Director

Organisation (if relevant):

Turley

Organisation representing (if relevant):

Clients of Delancey

Address line 1:

The Pinnacle

Address line 2:

20 Tudor Road

Address line 3:

Postal town:

Reading

Post code:

RG11NH

Telephone number:

Email:



## Part B - Your comments

3 Please provide your comments below.

Your Comments:

See submitted letter with representations

You can upload supporting evidence here: Wantage NP Representations.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

See submitted letter with representations

You can upload supporting evidence here: Wantage NP Representations.pdf was uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

## Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.



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20	INU	/CIII	ושט	2024

#### **Delivered by Email**

planning.policy@southandvale.gov.uk

Dear Sir /Madam

#### WANTAGE NEIGHBOURHOOD PLAN 2023 - 2031: CONSULTATION REPRESENTIONS ON BEHALF OF DELANCEY

We write on behalf of our client, Delancey (representing their clients) in response to the consultation on the Wantage Neighbourhood Plan 2023 – 2031 which has been published for consultation.

#### **INTRODUCTION**

Delancey (representing their clients) has promoted an existing employment site within Wantage which is let to a commercial occupier. Whilst our client has promoted the site to the Joint Local Plan on the basis that it could accommodate alternative uses (both commercial and residential) they wish to keep an open mind over its future. As such, our client wishes to ensure that the broad policy context is supportive of such sites being redeveloped for both alternative commercial and residential purposes given their sustainable nature.

#### **REPRESENTATIONS**

The following section sets out representations on the current consultation. In making these representations we have been mindful of the adopted Local Plan position, as well as the anticipated context which would apply in the event that the Joint Local Plan is found sound and adopted.

#### Policy 2 - Protection of Employment Sites

We note that this Policy allows for the redevelopment of, or extensions to, existing employment land that fully retain existing uses. This aspect of the Policy does not allow for the redevelopment of existing employment sites for alternative employment generating uses. This is a significant concern as it artificially restricts the ability of such sites to respond to the needs of occupiers.

The Pinnacle 20 Tudor Road Reading RG1 1NH



We raise concerns to this Policy on the basis that it only allows for the redevelopment of existing employment sites where it would result in a mixed use scheme. In our view, if it can be demonstrated that (subject to appropriate material considerations) that an employment site could be released for other purposes, there is no need to stipulate that the end result must be in a mixed use.

In combination, those two aspects of the Policy work to establish that existing employment sites could be redeveloped, provided it remains in the same use, or for a different use, provided it is part of a mixed use scheme.

That significantly restricts the ability of existing employment sites to be redeveloped for other purposes and could, in theory, lead to sites remaining vacant (for example if the existing (planning) use cannot be retained, or if a mixed use scheme cannot be accommodated (for whatever reason)).

The second aspect of the Policy (which allows redevelopment for a mixed use scheme) requires three considerations to be satisfied. Policy JT2 in the draft Joint Local Plan sets out scenarios whereby the Councils may agree to the redevelopment of existing employment sites, where: a) the applicants can demonstrate that any employment use is no longer viable; and b) it is evidenced that there is no market interest in the site following one year of active and effective marketing. That Policy would not specifically require that existing employment sites should remain in the existing planning use, or be part of a mixed use scheme (although it does encourage the inclusion of employment opportunities to be maximised). Equally, we note that Core Policy 29 of the adopted Local Plan does also not require that existing employment sites should remain in the existing planning use, or be part of a mixed use scheme.

Paragraph 2, part iii of the Policy requires that "where appropriate, adequate and deliverable alternative employment provision should be available within the Wantage development boundary". In our view this part of the Policy is unclear (it is not clear whether such development should exist, or capable of being delivered. There is also no explanation as to what is meant by the word 'adequate' (i.e. what is this to be measured against). The supporting text does not include any wording to clarify these matters.

On that basis, we note that Policy 2 is significantly more onerous than the position in either the adopted or emerging policy context.

In fact, in our view, Policy 2 is unnecessary as the Development Plan already includes equivalent measures.

We trust that these representations are useful and look forward to engaging with the Councils as the draft Plan progresses.

Yours sincerely

D'an at an	
Director	
	@turley.co.uk

## Response 7: ID BHLF-U5JT-4XN7-S

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-20 19:28:52 Next steps Part A - Personal Details 1 Are you completing this form as an: Organisation 2 Please provide your contact details below. Title: Name: Job title (if relevant): Planning Policy Officer (Neighbourhood) Organisation (if relevant): Vale of White Horse District Council Organisation representing (if relevant): Address line 1: Abbey House Address line 2: Abbey Close Address line 3: Postal town:

OX14 3JE

Abingdon

Post code:

Telephone number:

Email:

@southandvale.gov.uk

## Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please find Vale of White Horse's submission to this consultation attached.

You can upload supporting evidence here:

Wantage Neighbourhood Plan - DC Response.pdf was uploaded

 $4 \ \ \text{If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.}$ 

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

## Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

## Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

## Policy and Programmes

**HEAD OF SERVICE: TIM ORUYE** 



@southandvale.gov.uk
Tel: 01235 422600

20 November 2024

# <u>Wantage Neighbourhood Development Plan – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)</u>

Vale of White Horse District Council has worked to support Wantage Town Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful plan.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Wantage Neighbourhood Development Plan (NDP) during the presubmission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan meets the basic conditions.

Please note, the text in *italics* shows our recommended changes to the text, with any elements we recommend removing struck through and any we recommend adding in **bold**.

Ref.	Section/Policy	Comment/Recommendation
1	Throughout Plan	The name for the designation "Area of Outstanding Natural Beauty (AONB)" has recently been changed to "National Landscape". All references to AONBs throughout the plan should be updated accordingly.
2	Throughout Plan	The Vale of White Horse Design Guide has now been superseded by the Joint Design Guide covering both Vale of White Horse and South Oxfordshire. All references to the Vale of White Horse Design Guide throughout the plan should be updated to the Joint Design Guide accordingly.
3	Table of Contents	We recommend that the policy titles and their respective page numbers are included in the table of contents to ensure the plan is accessible and easy to navigate.
4	Paragraph 4.0.2	This paragraph does not accurately reflect the polices currently contained within the Plan. Policy 9 Manor Road Memorial Recreation Ground needs to be added to the list and Policy 10 Community Facilities needs to be removed as this is included as an aspiration and not a policy. Policy 6 should also be updated to include "and Biodiversity" in its title.
5	Paragraph 4.0.4	The Policies Maps are on pages 39 to 41 of the document and not 37-39, this should be updated.
6	Paragraph 4.0.5	We have concerns about the phrasing of this paragraph as it is not factually correct to state that all the existing landscape of the neighbourhood area is protected landscape as only a part of the neighbourhood area falls within the North Wessex Downs National Landscape. We recommend the following modification to this paragraph to ensure it is factually accurate and doesn't raise unrealistic expectations:
		"Where possible, the existing landscape of the Neighbourhood Plan area should will be protected for the sake of its own intrinsic beauty, its benefit to the rural character of the Vale of White Horse and for its biodiversity and geodiversity interest."
7	Policy 1: Town Centre Policy Area	Neighbourhood Plans do not have the power to determine the outcome of planning applications. Therefore, we recommend that the second paragraph of this policy is modified so that it gives support for use class E applications, rather than states that they are permitted:

Ref.	Section/Policy	Comment/Recommendation
		"Development proposals for uses within Class E will be permitted supported within the town centre boundary."
		Paragraph 3 of this policy largely duplicate Core Policy 32 of the Vale of White Horse Local Plan. The emerging Joint Local Plan 2041 (JLP) which recently completed its Regulation 19 consultation is bringing forward a more up to date approach for Wantage Town Centre, including the replacement of primary and secondary shopping frontages with a single primary shopping area. As we are currently in a period of transition from the Vale of White Horse Local Plan to the JLP, we recommended the following modifications to the policy:
		"Elsewhere in the area outside of the defined primary and secondary shopping frontages, proposals for new retail or other main town centre employment uses will be supported encouraged provided they follow address the sequential approach to site selection use as explained set out in the local plan (i.e. main centre, before edge of centre, before out of centre) and meet adopted car parking standards."
		We have concerns about the second bullet point of the 4 <sup>th</sup> paragraph of this policy as it is not clear how the needs of the community will be identified in order for this to be applied. If the intention is specifically to refer to the housing needs of the town, we recommend the following rewording of this section:
		"if the proposal is for residential development, it addresses meets Wantage's housing the needs of the residents within the local neighbourhood; and"
		Our Heritage Team would welcome a modification to the policy so that it sets out that new retail space, particularly in the historic core of the town, should implement sympathetic design that is in keeping with the character of Wantage and the Joint Design Guide. Our Urban Design Team also recommend that this policy could set out specifications on providing generous floor to ceiling heights, particularly at ground

Ref.	Section/Policy	Comment/Recommendation		
		floor level, to allow for flexibility and change of use over time:		
		"New retail or other town centre uses should:		
		i. implement sympathetic design which is in keeping with the character of Wantage and has regard to the Joint Design Guide. ii. provide generous floor to ceiling heights, particularly at ground level, to allow for flexibility and future change of use"		
8	Paragraphs 4.1.3 and 4.1.4	As with above, the Neighbourhood Plan does not have the power to determine the outcome of a planning application. We therefore recommend the following modification to the final sentence of paragraph 4.1.3 and the whole of paragraph 4.1.4:		
		"Any developments which support these ideas will be considered favourably. Development proposals which work towards delivering this vision would be supported."		
		"In order to deliver this vision, f-urther car parking is likely to will be required. and we would look favourably at any proposals for how this could be achieved. As such, development proposals which deliver additional parking would be supported."		
9	Policy 2: Protection of Employment Sites	As currently written, this policy does not provide the recognition that planning permission is not always required when changing use. Therefore, we recommend the following modification to the opening element of the second paragraph:		
		"When planning permission is required, proposals which result in a for change of use from employment to use are encouraged as part of a mixed-use scheme will be supported where it can be demonstrated that:"		
10	Policy 3: Design – General Principles	Paragraph 2 of this policy sets out that views into and out of the town should be preserved and respected by new development. It notes that these lines of sight are important contributors to the areas special character and should be preserved and respected where possible. However, the plan does not identify any specific views which should be prioritised for protection. The lack of identified views will make this		

Ref. Section/Policy Commerce element of the policy of the	
	difficult to implement in practice,
	esign – Character Areas where
	mentioned. The District Council
	pport the Town Council in
	nt views which have already been
identified.	
cycling infrastructure; an additional requirem be "well overlooked" well overlooked the policy to ensure the for those utilising them inserted through to PI	am welcome the section on however, they recommend that nent for any new cycling routes to wherever possible is inserted in to nat new cycling routes are safe n. We also recommend a link is an E: Wantage Proposed Cycle of what future cycling own may look like.
We recommend that that the principles sho	his policy is reworded to set out buld be applied on a
proportionate basis to	enable it to be applied
	development management
	suring the policy has the clarity  There is also the opportunity to
	this policy by ensuring that its
	a. As such, we recommend the
following modification	s to the policy to ensure that it
brings the clarity requ	ired by the NPPF:
	proposals will be supported, design has regard to the following
i. Where rele	vant, they have regard to the
	∀iews, as identified on figure
	ut of town which make a
1	ntribution to its the overall
	the town. and must be both
1 1 · · · · · · · · · · · · · · · · · ·	d respected in the design and fany new development.
positioning of	any now dov <del>olopment.</del>
	propriate and feasible, they
· · · · · · · · · · · · · · · · · · ·	oved provision for cycling
	e neighbourhood aArea;
1	rd to Plan E: Wantage ycle Routes. This may in the
· · · · · · · · · · · · · · · · · · ·	ntributions to improve cycling
	will be sought, where
	and feasible and may be in the

Ref.	Section/Policy	Comment/Recommendation
		form of financial contribution and/or
		appropriate design measures, including;
		a. Contributions to the improvement of
		existing bicycle lanes and paths;
		b. Contributions to the provision of safe and
		well designated cycle routes, especially on
		the main roads through the area. <b>New</b>
		cycle routes should be well overlooked
		wherever possible;
		c. Contributions to the provision of new
		bicycle lanes and paths;
		d. Contributions to the provision of new
		bicycle stands in all parts of the area - and
		particularly in town; and
		e. The provision of appropriate bicycle
		storage.
		It is important that any design measures meet the
		appropriate technical standard."
		appropriate too moun etamaan ar
		Our Urban Design team would also welcome an
		addition to this policy covering opportunities for new
		bin and recycling storage throughout the town centre:
		"iii. Where relevant, they provide new bin
		and recycling storage facilities."
11	Paragraph 4.3.1	Title
i	i alagiapii 4.5. i	This paragraph states that Policy 3 identifies three
	i alagiapii 4.5. i	design principles; however, only two design principles
	T aragraph 4.5.1	design principles; however, only two design principles are mentioned in the policy. This paragraph should be
	T aragraph 4.5.1	design principles; however, only two design principles are mentioned in the policy. This paragraph should be modified to remove this discrepancy.
12	Paragraph 4.3.4	design principles; however, only two design principles are mentioned in the policy. This paragraph should be modified to remove this discrepancy.  We have concerns that this paragraph reads as policy
		design principles; however, only two design principles are mentioned in the policy. This paragraph should be modified to remove this discrepancy.  We have concerns that this paragraph reads as policy text but is located in the supporting text. We
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12	Paragraph 4.3.4  Policy 4: Design –	design principles; however, only two design principles are mentioned in the policy. This paragraph should be modified to remove this discrepancy.  We have concerns that this paragraph reads as policy text but is located in the supporting text. We recommend that this paragraph is either relocated into the policy or that the following modification is implemented to the paragraph:  "All Delevelopments for more than 10 homes are encouraged to should provide a specific cycling plan which should address connectivity, permeability, and technical compliance."  We recommend that this policy is reworded to set out that the principles for each character area should be applied on a proportionate basis to enable it to be applied effectively during the development
12	Paragraph 4.3.4  Policy 4: Design –	design principles; however, only two design principles are mentioned in the policy. This paragraph should be modified to remove this discrepancy.  We have concerns that this paragraph reads as policy text but is located in the supporting text. We recommend that this paragraph is either relocated into the policy or that the following modification is implemented to the paragraph:  "All Delevelopments for more than 10 homes are encouraged to should provide a specific cycling plan which should address connectivity, permeability, and technical compliance."  We recommend that this policy is reworded to set out that the principles for each character area should be applied on a proportionate basis to enable it to be applied effectively during the development management process, therefore ensuring the policy has the clarity required by the NPPF.
12	Paragraph 4.3.4  Policy 4: Design –	design principles; however, only two design principles are mentioned in the policy. This paragraph should be modified to remove this discrepancy.  We have concerns that this paragraph reads as policy text but is located in the supporting text. We recommend that this paragraph is either relocated into the policy or that the following modification is implemented to the paragraph:  "All Delevelopments for more than 10 homes are encouraged to should provide a specific cycling plan which should address connectivity, permeability, and technical compliance."  We recommend that this policy is reworded to set out that the principles for each character area should be applied on a proportionate basis to enable it to be applied effectively during the development management process, therefore ensuring the policy

Ref.	Section/Policy	Comment/Recommendation
		Character Assessment" as this document sets out
		greater detail about each of the character areas and is
		a useful consideration for both developers and
		development management officers.
		Our Forestry Team recommend that the requirement for development schemes to "include new fruit tree
		planting" should be made less prescriptive and instead encourage the planting of the right tree in the right location. We therefore recommend a modification to this policy wording.
		We also recommend that this policy is marginally restructured so that it brings the clarity required by the NPPF and removes any ambiguity about which elements of the policy apply to which character area:
		"Development proposals will be supported provided: i. T their design is in accordance with the Development Plan-and reflects the
		character of that part of the town within which
		the land is located, as shown on the Policies
		Maps on pages <del>37-39</del> <b>39-41, taking account</b>
		of the specific design criteria for each
		character area as set out below and the
		Wantage Local Character Assessment.
		As appropriate to their scale, nature and
		location, development proposals within the
		Town Centre Conservation Areas <b>should</b> reflect the following principles:
		i. Any future development or redevelopment in the Conservation Area, including infill and
		back garden development, should be
		architecturally in keeping with adjacent
		buildings and appropriate in scale and
		massing; and
		ii. <b>utilise m</b> Materials for buildings, shop fronts
		and boundary treatments walls should which
		reflect the historic character of the character
		<b>area</b> , for example brick, render, clay tile, slate, stone and lime-based mortars.
		iii. <del>Specifically on</del> <b>ensure any new</b> shop
		signs, where practicable, efforts sould reflect
		the historic town centre and <del>again reflect</del> the
		historic character of the character area and
		be made of wood and not illuminated; <b>and</b>

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Ref.	Section/Policy	Comment/Recommendation
		xii. <del>Any future developments should</del> provide
		sufficient amenity open space and enhance
		the overall quality of the area, with respect to
		open spaces.
		xiii. <del>Development should</del> respect the character
		of the relevant area in its architectural style,
		scale, massing and materials.
		xiv. The density of any housing scheme or
		development should be informed by local
		circumstances and site constraints, including
		the required housing mix, and need to protect
		or enhance the local environment, Areas of
		Outstanding Natural Beauty the North
		Wessex Downs National Landscape,
		heritage assets, and important landscape,
		habitats and townscape; <b>and</b>
		xv. Landscape schemes should seek to retain
		existing on-site mature trees and hedges and,
		where appropriate, should include the
		planting of new trees appropriate to the
		growing conditions of the site. fruit tree
		<del>planting.</del>
		As appropriate to their scale, nature and location, development proposals within the South West Wantage Character Area should reflect the following principles:
		Proposals for development will only be
		supported where it can be demonstrated that;
		xvi. <b>maintain</b> the open character of this
		important natural landscape <del>will be</del>
		<del>maintained</del> ;
		xvii. <del>Development should</del> preserve or enhance
		the local character of the landscape and not
		have an unacceptable impact on important views <del>; and</del>
		xviii. The density of any housing scheme or
		development should be informed by local
		circumstances and site constraints, including
		the required housing mix, and need to protect
		or enhance the local environment, Areas of
		Outstanding Natural Beauty the North
		Wessex Downs National Landscape,
		heritage assets, and important landscape,
		habitats and townscape; <b>and</b>
		xix. <del>Landscape schemes should</del> seek to retain
		existing on-site mature trees and hedges and,
		where appropriate, should include <b>the</b>

Ref.	Section/Policy	Comr	nent/Red	commend	lation	
		planting o growing o <del>planting.</del>	of new tre	ees appr	opriate t	
		Innovative design in areas, provided the enhances where persurrounding area."	at it posit	ively resp	oonds to a	and
		The relevant maps of low quality and o particularly hard to the character areas maps are reproduct happy to assist the	difficult to identify was are. We sed, the E	understa where the recommodistrict Co	and. It is boundare that bouncil wor	ries of these
14	Policy 5: Design – Housing Types	The word "to" is err paragraph, this sho should be added to 2.	oneously ould be re	y included emoved.	d in the fi Additiona	lly, an "s"
15	Paragraph 4.5.1	A more up-to-date the Vale of White Hassessment) was obase for the emerging mix for new resider White Horse as base We recommend the paragraph is replacensure the Neighbor current needs of the	dorse (the complete ing JLP. ntial deve sed on the the horseld with tourhood	e Joint Hodge das part This esta elopments de latest elusing mix this up-to Plan acci	ousing No of the evablishes as in the Vevidenced referred odate mix	eeds idence a housing ale of d need. to in this
		"This policy on delivering needs of the of size to su market but a Joint House as part of the emerging J following h	g housing e local co it new er also dowl ing Need he evide loint Loc ousing I	g types the mmunity of trants interested in the second in	nat will me not just in to the hou or examplesment pole to for the 2041, sets ew resid	eet the n terms using ble, the roduced s out the
		Oxfordshire Assessment market hous	Strategic t, for the	<del>C Housing</del> <del>Vale of V</del>	<del>g Market</del> Vhite Hor	<del>se</del>
			1 bed	2 bed	3 bed	4 bed
		Market	5%	10%	70%	15%
		Affordable	13%	34%	40%	13%

Ref.	Section/Policy	Comment/Recommendation
		Our Equalities Team also recommend that the plan could additionally include a focus on accessible and adaptable homes for people with disabilities and older residents.
16	Paragraph 4.5.4	We recommend that a more specific percentage is applied to the number of plots to be used for self-building; for example, 2-3% on development of more than 50 houses. This will help to make the policy clearer and more effective.
17	Paragraph 4.5.5	As previously mentioned, the Vale of White Horse Design Guide has now been superseded by the Joint Design Guide covering both Vale of White Horse and South Oxfordshire. We therefore recommend that this paragraph is deleted.
18	Policy 6: Green Infrastructure Network and Biodiversity	We support the requirement for development to deliver a 10% biodiversity net gain (BNG); however, whilst we note this number is currently in line with existing national policy, the JLP is currently aiming to set a higher target of 20% BNG and the central government are also looking to increase this minimum BNG requirement. Additionally, the East Hagbourne Neighbourhood Plan in South Oxfordshire which is under the same JLP evidence has already been made with a requirement for 20% BNG. We therefore recommend that the BNG target for development in Wantage is set at 20%. We also note that the existing requirement for development to deliver a BNG of 10% is repeated twice in this policy, we recommend that the second reference is removed to avoid repetition.  Our Ecology Team recommend an expansion to this policy focussed on protected and Priority species and habitats and designated sites. This should take the opportunity to underline the importance of protecting important species, habitats and sites for nature during developments in Wantage and push for ambitious enhancement provision in developments.  The attached map to this policy, Plan D: Wantage Green Infrastructure Concept Map, includes areas which have now been developed, such as the Elmbrook Court Care Home on Grove Road, as green areas. Likewise, it also includes parts of the Crab Hill Strategic Allocation as green areas which are likely to be developed as housing, but does not include areas which have already been set aside as open space. We recommend that Plan D: Wantage Green Infrastructure Concept Map is updated to ensure that it accurately reflects the current and future use of the land

Ref.	Section/Policy	Comment/Recommendation
		proposed to be included within the network. The District Council would be happy to assist the Neighbourhood Planning group in producing an update to this map.
19	Plan E: Wantage Proposed Cycle Routes	This Figure appears to be out of context with the surrounding text, a more appropriate location for it would be next to Policy 3: Design – General Principles as this policy addresses new cycling infrastructure.
20	Policy 7: Green Infrastructure Network – Letcombe Brook	We recommend that the phrase "Where relevant" is added at start of policy to ensure that it is clear that the policy should only be applied to those developments which are considered to have an impact on the Letcombe Brook. We also recommend that the word "negative" is inserted into criterion i to ensure that it is clear that only negative impacts on the biodiversity value of the Letcombe Brook Corridor should be minimised.
		The overall structure of the policy can also be improved, including through the removal of unnecessary commas and the combination of criterions i, ii, and iii into a single criterion to avoid unnecessary duplication and improve the clarity of the policy, as required by the NPPF:
		"When relevant, and aAs appropriate to their scale, and nature and location, new development proposals should
		i. Minimize <b>negative</b> impacts on and provide net gains for the biodiversity value of the Letcombe Brook corridor. ii. Conserve, restore and enhance the
		biodiversity, landscape and recreational value of the Letcombe Brook and its tributaries including Manor Road Spring and the Humber Ditch and avoid any harmful impacts on the landscape and recreational
		value of these waterways.  ii. The landscape, of the Letcombe Brook and its tributaries including Manor Road Spring and Humber Ditch should be protected from harmful development and where possible
		enhanced. iii. The recreational value of the Letcombe Brook and its tributaries including Manor Road Spring and Humber Ditch should be protected from harmful development and where possible enhanced.

Ref.	Section/Policy	Comment/Recommendation
11011		iv. Include a long-term landscape and
		ecological management plan for the Brook,
		buffer strip and corridor;
		v. Provide or retain a minimum 10m natural
		green buffer between the top of the river-bank
		and the development in urban areas adjacent
		to the Letcombe Brook; and
		vi. Have regard to the landscape and design
		guidance set out in the 'Letcombe Brook –
		Planning Guidance for landowners and
		developers' in Appendix 1"
21	Paragraph 4.7.1	The first sentence of paragraph 4.7.2 is a near
	and 4.7.2	identical repetition of the final sentence of paragraph
		4.7.1. We recommend that the first sentence of
		paragraph 4.7.2 is deleted.
22	Policy 8: Green	Point ii. of the policy proposes a Local Green Space
	Infrastructure:	(LGS) allocation at Betjeman Park. An illustration of
	Local Green	the proposed site for this LGS is included in Appendix
	Spaces	2, which contains a note that sets out that a 2-metre
		buffer has been included within the LGS as the
		trustees of the site require a 2-metre strip to be set
		aside for the future provision of vehicular access.
		We recommend that rather than inserting a buffer strip
		into the Local Green Space, it would be more
		appropriate to amend the boundary of the Local Green
		Space to remove the 2-metre strip. This would ensure
		that the proposed LGS is compliant with paragraph
		105 of the NPPF which states that Local Green
		Spaces should only be designated where they are
		capable of enduring beyond the end of the plan period.
		By amending the boundary, this will ensure the
		proposed LGS can be brought forward.
23	Policy 8: Green	For clarity, the following comments are the Vale of
	Infrastructure:	White Horse District Council's views as landowner and
	Local Green	are completely separate from any other of the council's
	Spaces -	functions including that as planning authority:
	Comments from	
	the Council's	Whilst our usual preference as landowner would be to
	Property Team	resist any Local Green Space designation, if the
		Examiner feels that Willow Walk Nature Reserve,
		Tirrold Way Open Space and the Humber Ditch meet
		the necessary tests then the council as landowner is
		broadly content for them to be designated as Local
	<b>D</b>	Green Spaces.
24	Paragraph 4.8.1	The relevant paragraph numbers for the section
		relating to Local Green Spaces in the most recent
		edition of the NPPF are 105-107, the numbers in this
		paragraph should be updated to reflect this.

Ref.	Section/Policy	Comment/Recommendation
25	Policy 11: Community Assets	We recommend that this policy and associated supporting text is modified so that the police deals with valued community facilities rather than designated
		Assets of Community Value. This would allow existing important community facilities which are not
		designated as Assets of Community Value to benefit from the provisions in this policy. The District Council would be happy to work with the Town Council to
		revise this policy and supporting text.
		We also recommend that the phrase "will be resisted" is changed to "will not be supported" for clarity.
26	Community Aspiration: Community Facilities	To avoid confusion between the policies and this community aspiration, we recommend that the design and formatting of the aspiration is changed so that it no longer resembles the policies visually.
		Our Equalities Team also recommend that the aspiration should look to ensure that all new or improved facilities are designed with inclusivity in mind so they are welcoming and accessible to people of all ages, abilities, and economic backgrounds.
27	Implementation	Whilst it is possible for Neighbourhood Plans to include discussion about matters which fall outside those which can be addressed by planning policies, Planning Practice Guidance requires these to be clearly identifiable as aspirations and include a clear indication that they will not form part of the statutory development plan. In order to ensure that this section is clearly defined as addressing aspirations and actions which cannot be addressed through policy, we recommend the following modifications:
		"5. Aspirations, Actions and Implementation"
		"5.1.3 This chapter sets out aspirations and actions that cannot be addressed by planning policies within the neighbourhood plan, but which are of importance to the town and which the town council and community would like to address through alternative processes. These aspirations and actions address matters which are outside of the planning system and will not form part of the statutory development plan or impose any requirements on developers and landowners."

Section/Policy Paragraph 5.3.3	Comment/Recommendation
	The relevant paragraph numbers for the section relating to Planning Obligations in the most recent edition of the NPPF are 55-58, the numbers in this paragraph should be updated to reflect this.
Glossary	paragraph should be updated to reflect this.  We have concerns with various elements of this glossary which are set out below:  Out of date definitions:  Public Open Spaces, which the glossary states are managed by public organisations, are now managed as part of a Management Companies (MANCO) system  Starter Homes within the Affordable Homes section are no longer an affordable housing tenure, having been withdrawn and replaced by First Homes.  AONBs are now referred to as National Landscapes  The reference to the NPPF should mention the most recent update published in December 2023.  The Localism Act was last revised on 07/05/2024  There is no longer a specific requirement to identify primary and secondary frontages in the NPPF.  The glossary refers to the Vale of White Horse District Local Plan Part 1 but not the Local Plan Part 2, both parts should be referred to collectively as "Vale of White Horse Local Plan 2031" and the definition should include that it also sets out development management policies for the district.  Definitions not included withing the Plan  Historic Environment (Although Historic
	Character is mentioned multiple times so this could be updated to reflect this)  - Listed Buildings  - Local Enterprise Partnerships (LEPs)
	<ul><li>LPP1</li><li>Rural Exception Sites</li><li>Secured by Design (SBD)</li></ul>
	<ul> <li>SHLAA</li> <li>SHMA</li> <li>Special Areas of Conservation</li> <li>Strategic Gap</li> <li>Strategic Housing Land Availability Assessment</li> </ul>
	Glossary

Ref.	Section/Policy	Comment/Recommendation
		<ul> <li>Supplementary Planning Documents</li> <li>Sustainability Appraisal (SA or SA/ SEA)</li> <li>Sustainable Transport Modes</li> <li>SUDS</li> <li>Sustainable Urban Drainage System (SUDS)</li> <li>Transport Assessment</li> <li>Windfall Sites</li> <li>We recommend that the glossary is modified to update outdated definitions and to remove definitions which do not appear within the Plan document.</li> </ul>
30	General comment from Equalities Team	While the plan mentions footpath improvements, it could be enhanced by explicitly addressing accessibility for people with disabilities. For example, ensuring that features like dropped kerbs, tactile paving, and clear signage are considered could be beneficial. The emphasis on traffic and transport is important, but we recommend ensuring public transport options are fully accessible—such as buses with ramps, accessible stops, and suitable routes to serve elderly and disabled residents effectively.
31	General Comment from Urban Design Team	We recommend the specific mentioning of the Arbery Arcade and opportunities for refurbishing Victoria Cross Gallery which are in a prime location in the town centre. Arcades and gallery transformations projects and how to integrate them within the town centre offer would be inspiring to see within the plan. With the recent introduction of rain gardens as part of the Beacon's car park improvements, the plan could also explore opportunities around greening initiatives at street level and direct visitors towards the town centre.
32	General Comment from Ecology Team	We recommend including a community aspiration which sets out a clear link between the usage of funding from planning obligations to enhance the identified green network to increase its wildlife value.

## Appendix 1: Letcombe Brook Planning Guidance

33	Page 48	This guidance contains an out-of-date replication of
		the policy relating to the Letcombe Brook (now Policy
		7 in the Plan). We recommend that this section of the
		appendix is deleted to avoid confusion and repetition
		with the Plan, and to bring the clarity required by the
		NPPF.

## Wantage Local Character Assessment

34	Throughout	The Vale of White Horse Design Guide has now been
	Document	superseded by the Joint Design Guide covering both

Ref.	Section/Policy	Comment/Recommendation
		Vale of White Horse and South Oxfordshire. All
		references to the Vale of White Horse Design Guide
		throughout the plan should be updated to the Joint
		Design Guide accordingly.
35	Throughout	The name for the designation "Area of Outstanding
	Document	Natural Beauty (AONB)" has recently been changed to
		"National Landscape". All references to AONBs
		throughout the plan should be updated accordingly.
36	Overview -	At the end of the first paragraph of this section there is
	Guidelines for the	a missing value for the size of the floor space for small
	Future Urban Form	convenience food stores and pharmacies. This should
	Town Centre	be rectified or removed.
37	Appendix 2: Local	If the recommendation for a new map for the
	Character Areas	Character Areas is taken forward, as covered in
	Мар	comment Ref.13, we recommend that this map should
		also be used in place of the map in Appendix 2 for
		consistency and clarity.

Response 8: ID BHLF-U5JT-4XNS-N Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-28 21:16:15 Next steps Part A - Personal Details 1 Are you completing this form as an: Organisation 2 Please provide your contact details below. Title: Name: Job title (if relevant): Organisation (if relevant): Historic England Organisation representing (if relevant): Historic England Address line 1: 4th floor Address line 2: Cannon Bridge House Address line 3: 25 Dowgate Hill Postal town: London Post code: EC4R 2YA Telephone number: Email: @historicengland.org.uk Part B - Your comments 3 Please provide your comments below. Your Comments: Dear Vale of White Horse Planning Team,

Thank you for consulting Historic England on the Wantage Neighbourhood Plan Regulation 16.

I attach our response letter herewith.

Kind regards,

Business Officer, London and South East Region (Oxfordshire) Historic England, 4th floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

You can upload supporting evidence here: 2024 10 23 Wantage - NP Reg 16 W Letter.pdf was uploaded 4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

## Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.



Our ref: PL00797130

Planning.policy@southandvale.gov.uk by email only

23 October 2024

Dear Policy Team,

## Ref: Wantage Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.

We would be grateful if you would notify us on <u>e-seast@HistoricEngland.org.uk</u> if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

, Business Officer
On behalf of Historic Places Advisor
E-mail: <a href="mailto:@historicengland.org.uk">@historicengland.org.uk</a>





#### Response 9: ID BHLF-U5JT-4XNJ-C

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-28 21:24:01

Next step:	S
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Part A -	Personal	Details
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1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Planner

Organisation (if relevant):

Avison Young

Organisation representing (if relevant):

National Gas

Address line 1:

Central Square

Address line 2:

Forth Street

Address line 3:

Postal town:

Newcastle upon Tyne

Post code:

NE1 3PJ

Telephone number:

Email:

@avisonyoung.com

#### Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Gas.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgas.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards



Planner

Mobile +44 07985483600

@avisonyoung.com | avisonyoung.com

You can upload supporting evidence here:
12-11 Wantage NP Gas.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

#### Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

Other, please specify:



Central Square Forth Street Newcastle upon Tyne NE1 3PJ

T: +44 (0)191 261 2361 F: +44 (0)191 269 0076

avisonyoung.co.uk



Our Ref: MV/ 15B901605

12 November 2024

Vale of White Horse District Council planning.policy@southandvale.gov.uk via email only

Dear Sir / Madam

Wantage Neighbourhood Plan Regulation 14 Consultation October – November 2024 Representations on behalf of National Gas Transmission

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### **About National Gas Transmission**

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

### Proposed sites crossed or in close proximity to National Gas Transmission assets

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

https://www.nationalgas.com/land-and-assets/network-route-maps

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

#### **Distribution Networks**

Information regarding the gas distribution network is available by contacting: <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a>

#### **Further Advice**

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:





, Asset Protection Lead

nationalgas.uk@avisonyoung.com

Avison Young Central Square Forth Street Newcastle upon Tyne NE1 3PJ box.assetprotection@nationalgas.com

National Gas Transmission National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Director 0191 269 0094

@avisonyoung.com

For and on behalf of Avison Young



National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's 'Guidelines when working near National Gas Transmission assets' can be downloaded here: <a href="https://www.nationalgas.com/document/82951/download">https://www.nationalgas.com/document/82951/download</a>

#### How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <a href="https://lsbud.co.uk/">https://lsbud.co.uk/</a>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

# Response 10: ID BHLF-U5JT-4XNM-F

Submitted on 2024-11-28 21:25:50

Planner Mobile

@avisonyoung.com | avisonyoung.com

Submitted to Wantage Neighbourhood Plan: Submission consultation

Next steps Part A - Personal Details 1 Are you completing this form as an: Agent 2 Please provide your contact details below. Title: Name: Job title (if relevant): Planner Organisation (if relevant): Avison Young Organisation representing (if relevant): National Grid Address line 1: Central Square Address line 2: Forth Street Address line 3: Postal town: Newcastle upon Tyne Post code: NE1 3PJ Telephone number: Email: @avisonyoung.com Part B - Your comments 3 Please provide your comments below. Your Comments: Dear Sir / Madam We write to you with regards to the current consultations as detailed above in respect of our client, National Grid. Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification. Kind Regards

You can upload supporting evidence here: 12-11 Wantage NP.pdf was uploaded 4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

#### Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

Other, please specify:



Central Square Forth Street Newcastle upon Tyne NE1 3PJ

T: +44 (0)191 261 2361 F: +44 (0)191 269 0076

avisonyoung.co.uk



Our Ref: MV/ 15B901605

12 November 2024

Vale of White Horse District Council planning.policy@southandvale.gov.uk via email only

Dear Sir / Madam

Wantage Neighbourhood Plan Regulation 14 Consultation October – November 2024 Representations on behalf of National Grid Electricity Transmission

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### **About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

#### Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that it has no record of such assets within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

• www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.



# **Distribution Networks**

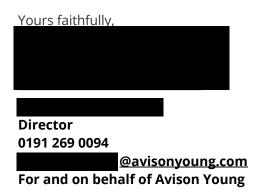
Information regarding the electricity distribution network is available at the website below: <a href="https://www.energynetworks.org.uk">www.energynetworks.org.uk</a>

#### **Further Advice**

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



If you require any further information in respect of this letter, then please contact us.





NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <a href="https://www.nationalgridet.com/document/130626/download">https://www.nationalgridet.com/document/130626/download</a>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here:
<a href="https://www.nationalgridet.com/network-and-assets/working-near-our-assets">www.nationalgridet.com/network-and-assets/working-near-our-assets</a>

#### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <a href="https://lsbud.co.uk/">https://lsbud.co.uk/</a>

For local planning policy queries, please contact: <a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a>

# Response 11: ID BHLF-U5JT-4XNT-P

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-28 21:29:12

INCAL SICES	Ν	ext	ste	ps
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1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant): Property Town Planner

Organisation (if relevant):

Thames Water

Organisation representing (if relevant):

Address line 1:

1st Floor West

Address line 2:

Clearwater Court

Address line 3:

Vastern Road

Postal town:

Reading

Post code:

RG1 8DB

Telephone number:

Email:

@thameswater.co.uk

# Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

Property Town Planner



1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

You can upload supporting evidence here: 24.11.15 Wantage NP issued.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

#### Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

Other, please specify:



Issued via email: planning.policy@southandvale.gov.uk

E: @thamewater.co.uk
M: +44

1<sup>st</sup> Floor West Clearwater Court Vastern Road Reading RG1 8DB

15 November 2024

# Vale of White Horse District –Wantage Neighbourhood Plan 2023-2031

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for the District and Wantage and hence are a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

# Policy 10: Infrastructure Investment - Water Supply and Wastewater/Sewerage Infrastructure

We generally support the reference to water and sewerage infrastructure in supporting text, but we consider that this does not go far enough and further detail is required and a specific policy covering water and wastewater/sewerage infrastructure.

Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."

Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."

Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...."

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

• The developments demand for water supply infrastructure;

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:

https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity

In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy to support section 11.1. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

#### PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

#### Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

#### Policy SD1 should be updated as follows:

"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

#### Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."

#### **Development Sites**

There are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity</a>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact	on the
above number if you have any queries.	

Yours faithfully,

Thames Water Property Town Planner

# Response 12: ID BHLF-U5JT-4XNV-R

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-28 21:31:05  $\,$ 

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Part A -	Personal	Details
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1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Officer

Organisation (if relevant):

Natural England

Organisation representing (if relevant):

Natural England

Address line 1:

County Hall

Address line 2:

Spretchley Road

Address line 3:

Postal town:

Worcester

Post code:

WR5 2NP

Telephone number:

03000603900

Email:

consultations@naturalengland.org.uk

#### Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir or Madam

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Kind regards

Officer
Natural England
Consultation Service
Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

You can upload supporting evidence here: 490536 Wantage Neighbourhood Plan Regulation 14 NE Response.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

#### Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

Other, please specify:

Date: 18 November 2024

Our ref: 490536

Your ref: Wantage Neighbourhood Plan

Vale of White Horse District Council

BY EMAIL ONLY

planning.policy@southandvale.gov.uk



T 0300 060 3900

Dear Sir or Madam

#### Wantage Neighbourhood Plan Regulation 14 Consultation

Thank you for your consultation on the above dated 10 October 2024

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

#### Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in <a href="Natural England">Natural England</a>'s Standing Advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.

Yours sincerely

**Consultations Team** 

# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

#### **Natural environment information sources**

The Magic¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found <a href="https://example.com/here">here²</a>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found <a href="https://example.com/herea/her

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the <u>Magic</u><sup>4</sup> website and also from the <u>LandIS website</u><sup>5</sup>, which contains more information about obtaining soil data.

#### Natural environment issues to consider

The <u>National Planning Policy Framework</u><sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. <u>Planning Practice Guidance</u><sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

#### **Landscape**

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for

<sup>&</sup>lt;sup>1</sup> http://magic.defra.gov.uk/

<sup>&</sup>lt;sup>2</sup> https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england

https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making

<sup>&</sup>lt;sup>4</sup> http://magic.defra.gov.uk/

<sup>&</sup>lt;sup>5</sup> http://www.landis.org.uk/index.cfm

<sup>&</sup>lt;sup>6</sup> https://www.gov.uk/government/publications/national-planning-policy-framework--2

<sup>&</sup>lt;sup>7</sup> http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

#### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed <a href="here">here</a>), such as Sites of Special Scientific Interest or <a href="Ancient woodland">Ancient woodland</a>9. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

#### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed <u>here 10</u>) or protected species. To help you do this, Natural England has produced advice <u>here11</u> to help understand the impact of particular developments on protected species.

#### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see <u>Guide to assessing development proposals on agricultural land</u> <sup>12</sup>.

### Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the <u>National Planning Policy Framework</u>. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory <u>Biodiversity Metric</u> may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the <u>Small Sites Metric</u> may be used. This is a simplified version of the statutory <u>Biodiversity Metric</u> and is designed for use where certain criteria are met. Further information on biodiversity net gain including <u>planning practice guidance</u> can be found <u>here</u>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's <u>Green Infrastructure Framework</u> sets out further information on green infrastructure standards and principles

<sup>&</sup>lt;sup>8</sup> https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england

<sup>&</sup>lt;sup>9</sup> https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences

<sup>10</sup> https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england

<sup>11</sup> https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals

<sup>&</sup>lt;sup>12</sup>https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land

- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's <u>Environmental Benefits from Nature tool</u> may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory <u>Biodiversity Metric</u> and is available as a beta test version.

<sup>&</sup>lt;sup>13</sup> https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

### Response 13: ID BHLF-U5JT-4XN4-P

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-28 21:34:19 Next steps Part A - Personal Details 1 Are you completing this form as an: Organisation 2 Please provide your contact details below. Title: Name: Job title (if relevant): Planning Manager Organisation (if relevant): JA Pye Organisation representing (if relevant): Address line 1: Langford Locks Address line 2: Kidlington Address line 3: Postal town: Post code: OX5 1HZ Telephone number: Email: @pyehomes.co.uk Part B - Your comments 3 Please provide your comments below. Your Comments: Dear Sir/Madam, On behalf of J A Pye (Oxford) Ltd, please find below our representation in response to the Vale's consultation on the draft Wantage Neighbourhood Plan. I would be grateful if you could confirm safe receipt.

Kind regards,

You can upload supporting evidence here:

Wantage Neighbourhood Plan Representation - Chainhill 20th November 2024.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here: No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

# Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply.

Other, please specify:



Planning Policy Vale of White Horse District Council Abbey House Abbey Close Abingdon-on-Thames OX14 3JE

20th November 2024

# Sent via e-mail only - planning.policy@southandvale.gov.uk

Dear Sir/Madam,

# Wantage Neighbourhood Plan 2023 – 2031. Representation relating to Land off Chainhill Road by J A Pye (Oxford) Ltd.

On behalf of J A Pye (Oxford) Ltd (herein referred to as 'Pye Homes') please find below a representation in response to the Wantage Neighbourhood Plan 2023 – 2031 'Submission Draft' consultation.

#### **Pye Homes' Interests**

Pye Homes has interests in land in Vale of White Horse District, including land in the Wantage Neighbourhood Area.

Pye Homes has submitted representations to support the sustainable residential-led development of its land interests through the Vale of White Horse and South Oxfordshire District Council's emerging Joint Local Plan.

## Response to 'Submission Draft' Neighbourhood Plan Consultation

Pye Homes is pleased that it's comments in response to the Regulation 14 Neighbourhood Plan have resulted in positive amendments to this submission draft plan.

However, we are particularly concerned that Policy 6 of the Neighbourhood Plan, as submitted, does not have regard to national policy and guidance; and does not contribute to the achievement of sustainable development. Consequently, without modification, the submitted Neighbourhood Plan does not meet the basic conditions.

Fortunately, there is an opportunity to modify part of Policy 6 and in so doing, ensure that the basic conditions can be met and that the Neighbourhood Plan, as modified, can progress to Referendum, without risk of it comprising a flawed document.

#### Policy 6 'Green Infrastructure Network and Biodiversity'

Policy 6 does not meet the basic conditions. Whilst the Policy seeks to enhance green infrastructure in line with national and local policy and sustainable development principles, it hampers its own aims and ambitions by the inclusion of wording that does not have regard to national policy and guidance and which serves to actively prevent the achievement of sustainable development.

Policy 6 is not a Local Green Space policy. Local Green Space policy enables communities to protect areas of green space that are demonstrably important to them. Policies for managing development within a Local Green Space must be consistent with those for Green Belts and consequently, a Local Green Space designation is very restrictive, in line with its specific purpose of protecting green space.

The Neighbourhood Plan contains a Local Green Space policy (Policy 8). Consequently, areas of green space important to the community are protected.

Policy 6 is not a Local Green Space policy. However, as worded, Policy 6 is even more restrictive and limiting than Local Green Space policy and consequently, national Green Belt policy.

Policy 6 (i) requires development proposals to:

"Demonstrate how they sustain or enhance the visual characteristics and the function of the land."

This would comprise an entirely new and inappropriate form of policy control, introducing a restrictive and subjective approach that does not have regard to national policy, is not in general conformity with local strategic policy and which does not contribute to — but rather, places a significant barrier in the way of - the achievement of sustainable development.

The wording of Policy 6 (i) would allow the prevention of development on the basis that it does not enhance the appearance or the "function" of land – which presumably is intended to relate to land use, albeit the Policy does not define the term "function" and therefore this part of the Policy does not have regard to Paragraph 16 of the NPPF, which requires plans to be clearly written and unambiguous.

Neither Green Belt, nor even national heritage policy, places such an onerous requirement upon development as to <u>require</u> "*enhancement."* Notably, the Policy does not seek to distinguish between land within or outside the AONB.

It is also notable in this regard that, given that there is no substantive evidence to demonstrate that development could possibly meet the albeit subjective requirement to "sustair" the status quo (see below), enhancement effectively becomes a requirement of Policy 6 (i). This would be a requirement that does not have regard to national policy and which would prevent the achievement of sustainable development. The significant departure from and conflict with national policy, is not justified by any evidence and Policy 6 (i) does not meet the basic conditions.

Further to the above, as worded, Policy 6 (i) requires development to "sustair" the visual characteristics and function of land. It is not clear, in the absence of any evidence at all, how any form of development might come forward whilst managing to "sustair" the visual characteristics and function of land.

Development requiring planning permission will, by the very definition of development requiring planning permission, result in some form of change. There is no evidence to demonstrate that it is even possible for development to "sustair" the visual characteristics (ie, the appearance) and the function (ie the use) of land. Paragraph 16 of the NPPF requires plans to be deliverable. Policy 6(i) is not deliverable and does not have regard to national policy.

The impact of Policy 6 (i) as worded would be to place a very significant – to the point of immovable - obstacle in the way of the achievement of sustainable development. Crucially, not only would this prevent the Neighbourhood Plan from contributing to the achievement of sustainable development, but it would also conflict with and work directly against the Policy's own aims of securing biodiversity net gain and enhancing the Neighbourhood Area's green infrastructure network via support for sustainable development.

The wording of Policy 6 (i) results in the Policy conflicting with itself.

As set out, the Policy effectively serves to prevent any development that would change and/or not enhance the use or the appearance of land. Such an approach goes well beyond any form of local or national policy. It serves to prevent the achievement of sustainable development.

Even national Green Belt policy – one of the most restrictive planning policy designations – does not impose the unduly onerous requirement for development to "sustain or enhance the function of the land." In addition to this, in the absence of evidence setting out the existing "function" (whatever that might be) of each area of land identified as green infrastructure, Policy 6 (i) does not have regard to national guidance, which requires neighbourhood planning policies to be clear, concise and precise.<sup>1</sup>:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."

Notwithstanding all of the above, we note that Policy 6 aspires to improve green infrastructure and biodiversity for existing and future residents. This is something that we strongly support and we acknowledge that the main part of Policy 6 recognises the fundamentally important role that sustainable development has in respect of enhancing and protecting green infrastructure.

Given this, in order for Policy 6 to meet the basic conditions, we respectfully suggest that the Examiner takes the opportunity, further to examining the Neighbourhood Plan against the basic conditions, to make one of the following changes:

-

<sup>&</sup>lt;sup>1</sup> Planning Guidance, Paragraph: 041 Reference ID: 41-042-20140306.

- Delete Policy 6 (i) ("Demonstrate...function of the land;"), or
- Delete Policy 6 (i) and replace with new wording along the lines of: "Respect local character,"

Either of these changes would enable Policy 6 to meet the basic conditions. Currently, the wording of the Policy results in the Wantage Neighbourhood Plan failing to meet the basic conditions and it cannot progress to Referendum in its current form.

Comments on approach to housing allocations

Wantage's neighbourhood plan has the opportunity to support the spatial development strategy set out in the local plan and it should shape and direct development that is outside of strategic policies (as outlined in para 13 of the National Planning Policy Framework).

The District's adopted and emerging local plan identifies Wantage as a 'Tier 1' settlement - the most sustainable locations for future growth. As such, and pursuant to this strategy, the plan could benefit from allocating sites for development. This would not only help meet immediate and future housing need but has the potential to deliver other community benefits including improved pedestrian and cycle links, new green infrastructure and biodiversity net gain.

Noting that it appears inevitable that Vale of White Horse District will see significant housing growth during the plan period and that as a Tier 1 settlement, Wantage, with its range of services and facilities, will have a key role to play in providing new homes. The allocation of sites would have enabled the local community to exert more control and certainty over housing delivery during the plan period. Given the inevitability of housing growth in line with national policy, this would also have likely enabled the Plan to remain up to date over an extended time scale.

However, we note that the Neighbourhood Plan does not seek to allocate land and we acknowledge that there is no statutory requirement for it to do so. Housing allocations will arise via the emerging Local Plan – which itself will be informed by national policy.

#### **Policy 8 - Local Green Space**

The Policy wording provided in Policy 8 is not consistent – and conflicts with - policies for managing development in Green Belts. It fails to take account of development that is not inappropriate in the Green Belt and is more restrictive than Green Belt policy.

No justification is provided in respect of the resulting departure from national policy.

The Policy should be re-worded in an appropriate manner.

This is a matter supported by a Court of Appeal decision<sup>2</sup>, where a Qualifying Body, in a similar way to Wantage Town Council, sought to include Local Green Space policy requirements which clearly strayed from the succinct and precise requirements of national policy, which are that:

"Policies for managing development within a Local Green Space should be consistent with those for Green Belts."

(Paragraph 107, the Framework)

## **Concluding comments**

Pye Homes supports the delivery of sustainable development. We would be pleased, at some future point, to work collaboratively with Wantage Town Council to bring forward high quality sustainable development, to the benefit of the town and in keeping with the positive aspirations of the Neighbourhood Plan.

I trust the above is clear and we look forward to receiving confirmation that the submission has been received in due course. Should you have any questions regarding the enclosed information, please don't hesitate to contact me.

Yours faithfully,

**Planning Manager** 

<sup>&</sup>lt;sup>2</sup> Lochailort Investments Ltd, R (On the Application Of) Mendip District Council [2020] EWCA Civ 1259. Lord Justice Lewison considered that the Local Green Space policy (Policy 5) in the Norton St Philip Neighbourhood Plan was more restrictive than national policies for managing development within the Green Belt. "In my judgement that means that it is not consistent with national Green Belt policy. It does not, therefore, comply with...the NPPF...if a neighbourhood plan departs from the NPPF it must be a reasoned departure. No reasons for the departure were given in this case."

### Response 14: ID BHLF-U5JT-4XN3-N

Submitted to Wantage Neighbourhood Plan: Submission consultation Submitted on 2024-11-28 21:36:55 Next steps Part A - Personal Details 1 Are you completing this form as an: Organisation 2 Please provide your contact details below. Title: Name: Job title (if relevant): Strategic Planner Organisation (if relevant): Oxfordshire County Council Organisation representing (if relevant): Address line 1: County Hall Address line 2: New Road Address line 3: Postal town: Oxford Post code: OX1 1ND Telephone number: Email: @oxfordshire.gov.uk Part B - Your comments 3 Please provide your comments below. Your Comments: \*\*EXTERNAL\*\*

Dear South and Vale Planning Policy Team,

Please find attached Oxfordshire County Council's response to the Draft Submission Wantage Neighbourhood Plan.

As is outlined in our response, OCC have no record of being consulted at Reg 14 stage. We therefore ask that our comments are given adequate consideration at this stage.

We kindly request that you acknowledge your receipt of this email.

Best wishes,

Strategic Planner Strategic Planning & Infrastructure



Oxfordshire County Council, County Hall, New Road, Oxford, OX1 1ND https://www.oxfordshire.gov.uk/

You can upload supporting evidence here:

Oxfordshire County Council response- Wantage Neighbourhood Plan- 21.11.2024 (1).pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of Vale of White Horse District Council's decision to 'make' (formally adopt) the plan?

#### Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

#### Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wantage Neighbourhood Plan consultation? Please tick all that apply. Other, please specify:



# OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

**District:** Vale of the White Horse

**Consultation: Wantage Neighbourhood Plan 2023-2031** 

Annexes to the report contain officer advice.

# **Overall View of Oxfordshire County Council**

Oxfordshire County Council welcomes the opportunity to comment on the Wantage Neighbourhood Plan and supports the Town Council's ambition to prepare a Neighbourhood Plan.

Officer's Name:

Officer's Title: Strategic Planner

Date: 21 November 2024

# ANNEX 1

# **OFFICER ADVICE**

**District:** Vale of White Horse

Consultation: Wantage Neighbourhood Plan 2023 – 2031 (Submission Document)

**Team:** Strategic Planning

Officer's Name: Officer's Title: Strategic Planner

Date: 21/11/2024

# **Strategic Planning Comments**

#### Introduction

Wantage is a mid-sized town approximately 13 miles southwest of Oxford. The town is identified as a Tier 1 Settlement in the emerging South Oxfordshire and Vale of the White Horse Joint Local Plan and a Market Town in the adopted Vale of the White Horse Local Plan 2031. The Neighbourhood Plan area includes the Crab Hill Strategic Site allocated in the Vale of the White Horse Local Plan.

Oxfordshire County Council was initially consulted on the Wantage Pre-submission Neighbourhood Plan in 2015, and again on the submission version in 2016. In 2016 an independent examiner outlined that the plan did not meet the Basic Conditions due to the lack of robust assessment underpinning the draft policies. The Vale of White Horse District Council agreed with the examiners report and issued a decision notice on 2nd September 2016 which outlined that the Neighbourhood Plan did not meet the basic conditions and as such should not proceed to a Referendum.

Following on from this Wantage Town Council undertook further Regulation 14 (presubmission) consultation in June 2022. However, Oxfordshire County Council has no record of receiving an invitation to comment on the pre-submission version of the plan in 2022 and as such the current (submission) consultation is the first version of the Neighbourhood Plan that Oxfordshire County Council has commented on since 2016. We therefore ask that Oxfordshire County Council's comments are adequately considered at this stage.

#### Joint Local Plan (JLP)

An immediate concern upon considering the proposed plan is a lack of reference to the emerging South Oxfordshire and Vale of the White Horse Joint Local 2041 which has just undergone Regulation 19 consultation and is anticipated to be submitted for examination in Winter 2024. In particular, reference should be made to Policy SP9- A Strategy for Wantage which outlines the JLP's approach to steering development within Wantage.

# National Planning Policy Framework (NPPF)

The Strategic Planning Team also notes that some of the references to NPPF paragraphs are out of date and need to be updated to reflect the latest version of the NPPF (such as at Paragraph 4.8.1).

#### Parking

Greater reference should be made to the objectives of Oxfordshire Local Transport and Connectivity Plan, and the aims of Core Policy 35 (i) of the Vale of White Horse Local Plan 2031 (VWHLP) and Policy IN2 of the emerging South Oxfordshire and

Vale of the White Horse Joint Local 2041. These include the reduction of car journeys and the promotion of greater levels of active travel usage.

The proposed Neighbourhood Plan contains several insinuations to a desire to increase the amount of parking provision within the town centre. This is contrary to the aims of the policy documents listed above which seek to reduce private car journeys and shift towards public and active transport solutions.

Where the plan makes reference to a requirement for new parking provisions, reference should be made to the Oxfordshire County Council Parking Standards.

For a full list of recommended alterations with regards to parking please see the attached Transport DM and Place Making comments.

## Grove and Wantage Railway Station

Core Policy 19 of VWHLP and Policy IN3 of the emerging South Oxfordshire and Vale of the White Horse Joint Local 2041 supports the re-opening of Wantage and Grove Rail Station and aims to do this within the lifespan of the Local Plan and this proposed neighbourhood plan. This should be mentioned within the Neighbourhood Plan to acknowledge the opportunities and benefits this would provide.

### **Policy 5: Design- Housing Types**

The policy or supporting text could encourage single storey dwellings to comply with the optional Building Control Approved Document M4(2) which encourages increased levels of accessibility.

#### **Policy 6: Green Infrastructure Network and Biodiversity**

This policy seeks to Identify a Green Infrastructure Network within the plan area and add additional controls to development within these area. Whilst the Council is broadly supportive of the aims of the policy there is some concern that one of the areas identified adjacent to Seesen Way includes land owned by Oxfordshire County Council as part of Stirlings Care Home.

# Recommendation

Representing our Property Assets Team, this designation would restrict Oxfordshire County Council being able to potentially develop the site in the future. It is therefore recommended that the Green Infrastructure network be amended so as to not include this land (see drawing page 8).

# Policy 8: Green Infrastructure - Local Green Spaces

This policy identifies and protects land designated as Local Green Space. There seems to be some variation between the land identified in the map of Local Green Space on page 26 and Appendix 2; particularly C- Humber Ditch and Adjacent Green Space where an area of Hampden Road to the southwest is identified in the Appendix but not the map on Page 26.

Furthermore, these Local Green Space designations include land owned by Oxfordshire County Council including Highways Land. Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of

the land means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way.

#### Recommendation- Parcel B, Betjeman Millennium Park.

 It is requested that the southern boundary of the Local Green Space designation, as shown in Appendix 2, be amended to exclude Highways Land (see drawings on page 14)

#### Recommendation- Parcel C, Humber Ditch and Adjacent Green Space

- It is requested that the section of Local Green Space shown to the southwest of Hampden Road be removed from the drawing in Appendix 2 as this is entirely Highways Land (see drawings on page 14)
- It is requested that the boundary of the main area of Local Green Space bounded by Hampden Road, Courtney Road and Tirrold Way as shown in Appendix 2, be amended so as to not include Highways Land (see page 14)
- It is requested that the boundary of the parcel of Local Green Space to the adjacent to Charlton School be adjusted to exclude land owned by Oxfordshire County Council (see drawing on page 9). This will prevent any fettering of future development of the school. School playing fields are already provided protection be Sports England as such another layer of protection is deemed unnecessary.

#### **Policy 10: Infrastructure Investment**

The policy and supporting text could more clearly define what level of evidence is required to demonstrate compliance with the policy. Furthermore, reference should be made in the supporting texts to the Grove Allocation AS8 in the Joint Local Plan as this is a 'large-scale provision...near Wantage'.

**District:** Vale of White Horse

**Consultation:** Wantage Neighbourhood Plan 2023 – 2031 (Submission Document)

**Team:** Minerals and Waste

Officer's Name:

Officer's Title: Planning Officer

Date: 07/11/2024

## **Minerals and Waste Comments**

The Minerals and Waste Team welcomes the opportunity to comment on the Wantage Neighbourhood Plan (submission version).

It should be noted that there is a safeguarded waste site within the Neighbourhood Plan Area, which lies within the Charlton Character Area but is excluded from the Neighbourhood Plan as a County Matter.

We are seeking a correction to the entry for Oxfordshire County Council in the glossary in regard to Oxfordshire County Council statutory Minerals and Waste function, see below.

Page 45, 'Oxfordshire County Council (OCC) – The Authority of the County of Oxfordshire responsible for services such as education, transport, emergency services and <u>minerals and waste planning</u>, <u>including</u> waste disposal.'

Further, we would welcome the inclusion of the Minerals and Waste Core Strategy (2017)<sup>1</sup> in the glossary.

<sup>1</sup> https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/core-strategy

6

**District:** Vale of White Horse

**Consultation:** Wantage Neighbourhood Plan 2023 – 2031 (Submission Document)

**Team:** Property Strategy (Assets and Investments)

Officer's Name:

Officer's Title: Senior Corporate Assets Officer

**Date:** 01/11/2024

## **Property Strategy (Assets and Investments) Comments**

Oxfordshire County Council (OCC) Property welcomes the opportunity to respond to the Wantage Neighbourhood Plan 2023 – 2031 submission document and would like to provide the following comments:

#### Policy 6: Green Infrastructure Network and Biodiversity

OCC Property notes that this draft policy suggests the protection and enhancement a number of green spaces in the town through the establishment of a Green Infrastructure Network. OCC Property notes that this network would cover a number of OCC freehold and leasehold properties. Broadly speaking, OCC is supportive of the principle of this policy, particularly the requirement that development should result in a biodiversity net gain of at least 10% measured by a recognised biodiversity metric.

However, OCC Property notes that a large part of Stirling's Care Home to the south appears to fall within this Green Infrastructure Network. As this designation would restrict OCC ability to redevelop the wider site in the future, OCC Property therefore wishes to lodge an objection to the designation of this land as part of the Green Infrastructure Network and request that either this designation be removed from the policy designation or the designation be reduced in scale so that it does not extend as far across the site as it currently does.





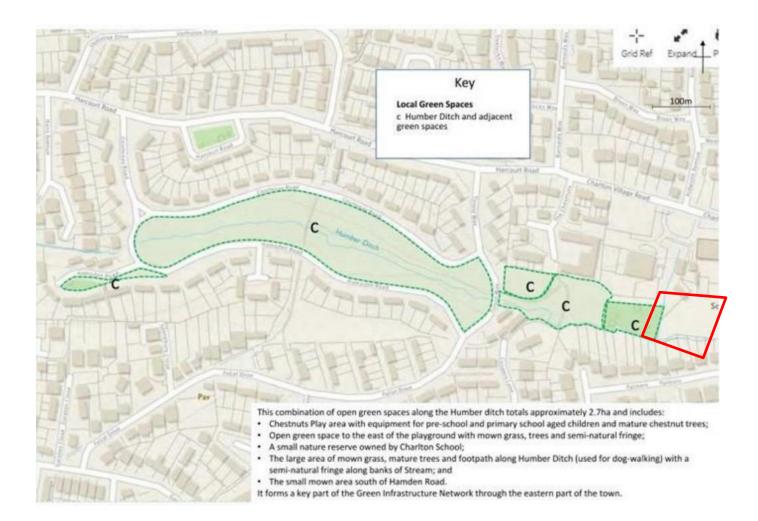
#### Policy 8: Green Infrastructure - Local Green Spaces

OCC Property notes that this draft policy suggests the protection of a number of important green spaces in the town from development which have been identified because of their value to the community and their local significance. OCC Property notes paragraph 4.8.4 that school property has been specifically excluded from the green space policies to ensure that the school can expand to meet the future educational requirements and to ensure that we can continue or improve the outstanding services that schools provide.

One of the areas proposed to be designated is described as "c Humber Ditch and adjacent green spaces". OCC Property controls the eastern most parcel of land which is described in the document as a "small nature reserve owned by Charlton School". This land is in fact owned by OCC but is currently subject to a 125 year academy lease to the Vale Academy Trust who operate the school site on OCC's behalf.

As this is therefore school land OCC Property is concerned about this designation, as it will impose further unnecessary layers of protection on County Council land that is already managed for public benefit. OCC Property would also like to highlight that school playing fields are already protected by Sports England.

OCC Property therefore wishes to lodge an objection to the designation of this land as a Local Green Space and request that this parcel of land be removed from the policy designation.



**District:** Vale of White Horse

**Consultation:** Wantage Neighbourhood Plan 2023 – 2031 (Submission Document)

Team: Transport DM and Place Making

Officer's Name:

Officer's Title: Assistant TDM Officer & Transport Planner

**Date:** 14.11.2024

## **Transport DM and Place Making Comments**

#### Page 10 paragraph 4.0.7

The plan states 'we would look favourably on developments which help to reduce the amount of traffic on roads in the Town Centre and which provide: <u>alternative</u> parking for those employed in or visiting the town by car or by coach'.

It is not clear what alternative parking means in this context. If it insinuates 'additional', this will contradict with the want to 'reduce the amount of traffic on roads within the town centre'. Additional parking would encourage short journeys into the town centre via private vehicle. In line with Core Policy 35 (i) of the Vale of White Horse Local Plan 2031 (VWHLP), the Neighbourhood Plan should support measures that enable a modal shift to public transport, cycling and walking. To ensure the local plan aligns with the wider development plan, this should be clarified.

#### Page 11 Policy 1: Town Centre Policy Area

The policy states, 'Elsewhere in the area outside of the defined primary and secondary shopping frontages, proposals for employment uses will be encouraged provided they address the sequential approach to use as explained in the local plan... and meet adopted car parking standards.'

This should be amended to: 'Elsewhere in the area outside of the defined primary and secondary shopping frontages, proposals for employment uses will be encouraged provided they address the sequential approach to use as explained in the local plan... and meet adopted **Oxfordshire County Council** car parking standards.'

#### Page 12 Paragraph 4.1.3

The Plan states 'Our vision is to expand the shopping space and create more pedestrian space within the Market Place. Working with neighbouring parishes to find somewhere for long term parking will free up town centre parking for visitors. Also, ensuring that buses have an interchange outside the Market Place, so that the Market Place is simply a drop-off/pick-up point, will free up space. Any developments which support these ideas will be considered favourably.'

Please see our comments to paragraph 4.0.7

This should be amended to: Working with neighbouring parishes we will endeavour to find parking in appropriate locations, to Oxfordshire County Council standards, to enable the reduction of on and off street parking in places of

# high footfall to find somewhere for long term parking will free up town centre parking for visitors.

Market Place is not just an interchange, it is where a lot of bus routes start and finish and therefore need to have some layover time to prepare for their next journey and recover time if running late.

#### Page 12 paragraph 4.1.4

The plan states, 'Further car parking will be required, and we would look favourably at any proposals for how this could be achieved'.

Any new residential and non-residential planning applications will be based on their own merits. They will be expected to provide both vehicle and cycle parking provision in accordance with Oxfordshire County Council standards. New residential and non-residential development which exceeds Oxfordshire County Council parking standards will not be accepted. As mentioned in our comments to paragraph 4.0.7, additional parking would encourage short journeys into the town centre via private vehicle.

#### Page 14 Policy 3: Design – General Principals

The policy states, 'Development proposals will be supported, provided their design has regard to the following principles:

- ii. Improved provision for cycling throughout the Area. Contributions to improve cycling opportunities will be sought, where appropriate, and feasible and may be in the form of financial contribution and/or appropriate design measures;
- a. Contributions to the improvement of existing bicycle lanes and paths;
- b. Contributions to the provision of safe and well designated cycle routes, especially on the main roads through the area;
- c. Contributions to the provision of new bicycle lanes and paths;
- d. Contributions to the provision of new bicycle stands in all parts of the area and particularly in town; and
- e. The provision of appropriate bicycle storage.

Mobility Hubs:

- Please can you clarify what you mean by the 'Area'.
- The above should be amended to: 'and feasible and may be in the form of financial contribution and/or direct delivery appropriate design measures:
- For a-d, amend to: Contributions/direct delivery.
- For e, please include shelters, and provision for cargo bikes and trailers.
- For information, Policy SP9 of the draft Joint Local Plan:
   ii) supporting enhancements to the Strategic Active Travel Network and
  - iii) enhancing existing pedestrian and cycle routes and links between them, particularly where they are identified in a Local Cycling and Walking Infrastructure Plan:

The policy states 'It is important that any design measures meet the appropriate technical standard.'

It should be amended to: 'Design measures must accord to national and local standards including LTN 1/20, Manual for Streets (MfS) and OCC's Residential Guides.'

All pedestrian and cycle routes will be required to be designed in accordance with Local Transport Note (LTN) 1/20 and any further guidance supplied by Active Travel England and DfT. Rural routes must consider this design standard and seek to provide suitable designs that accord with Policies 1, 2, 3b & c and 4b in the LTCP and with the County's public rights of way requirements in accordance with Policy 5 of the LTCP and OCC's adopted Rights of Way Management Plan 2015-2025.

#### Page 15 Paragraph 4.3.3

The plan states, 'Secondly, that the cycling policies of the District Council and County Council are supported and enhanced in Wantage.'

Recommend expanding on and referencing the specific policies.

#### Page 15 paragraph 4.3.4

The plan states 'All development for more than 10 homes should provide a specific cycling plan which should address connectivity, permeability, and technical compliance.'

Recommended amendment to: 'All development for more than 10 homes should provide a specific cycling plan which should address connectivity, permeability, and technical compliance in accordance with LTN1/20 Oxfordshire Cycling Design Standards and Oxfordshire Street Design Guide.'

#### Page 17 paragraph 4.4.2

The plan states: 'it is recognised that in the Town Centre Conservation Area some proposals for new housing may not be able to meet the required density standard and accommodate sufficient off street car parking spaces.'

As per Oxfordshire County Council parking standards, new residential and non-residential development which use a reduced level or take a 'car free' approach to vehicle parking may be considered by officers so long as the appropriate mitigation measures are in place.

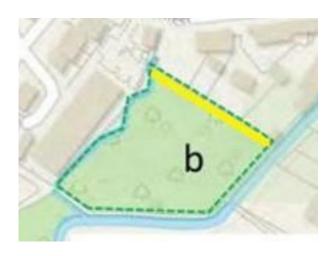
#### Page 25 Policy 8: Green Infrastructure – Local Green Spaces

The Policy states, 'The Neighbourhood Plan designates Local Green Spaces in the following locations, as shown on the Policies Maps on pages 37-39:

- a) Alfred's Well
- b) Betjeman Park
- c) Humber Ditch and the adjacent green spaces
- d) Letcombe Brook Wildlife Corridor (including Willow Walk Nature Reserve)

New development will not be supported on land designated as Local Green Space unless in very special circumstances.'









The local green spaces identified above appear to be partly or wholly within the maintained highway (they are within highway land and the County Council is the relevant Highway Authority). The ones above are just examples, <u>all green spaces should be checked.</u>

The plans above (shown in pink) are extracts from the highway extent mapping showing coloured what are, according to our current records the highways maintainable at the public expense in the area of interest and a key explaining the colouring used. Uncoloured areas (which are not otherwise Public Rights of Way) are not publicly maintained and we hold no records of private ownership. The colouring shows the extent of the highways according to our current highway record plan except that where there is a roadside ditch the highway boundary is usually the roadside edge of the ditch. They do not constitute a formal highways search, if you

require plans for your consultation report etc please request them at <a href="https://www.oxfordshire.gov.uk/highwaysearches">www.oxfordshire.gov.uk/highwaysearches</a>

Where land has highway status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and repass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way

We suggest adding some wording to support an accessible, sealed surface shared path from Smiths Wharf into and through Letcombe Brook Wildlife Nature Reserve. This would support safe active travel movements north south from Grove to the town centre and extend the valuable school commuting route.

#### Page 30 Paragraph 4.10.1

The plan states, 'The proposals set out in the Vale of White Horse Local Plan are supported in this Neighbourhood Plan because they can, on the whole and with appropriate S106 contributions, be accommodated within the existing infrastructure of the Town. It is likely that any significant increase in the housing level proposed for Wantage will cross supply/capacity thresholds for

water/sewerage/transport/health/education and other community facilities. In addition, it is likely that any large-scale provision (within or near Wantage) will have wider impacts on the town and adjacent areas. In this case the Town Council will seek to work with adjacent Parish Councils, the District Council, County Council and/or a potential developer to deliver enhanced facilities. This might include the provision of new cycling and walking facilities, town centre traffic management and sports facilities.'

This should be amended to: 'The proposals set out in the Vale of White Horse Local Plan and any plan that supersedes this one are supported in this Neighbourhood Plan...' and 'the District Council, County Council and/or a potential developer to deliver enhanced or new facilities. This might include the provision of new cycling and walking facilities, town centre traffic management and sports facilities.'

#### Page 33 Paragraph 5.2.3

The Plan states, 'For example, the Western Relief Road, the Grove Station, the green corridors separating Wantage from surrounding villages, the continuation of Letcombe Brook and the Wilts & Berks Canal are all projects or existing assets that are important to Wantage.'

We suggest the following changes: 'For example, the **Wantage Western Movement Corridor** Relief Road, the **Wantage and** Grove Station, the green corridors separating Wantage from surrounding villages, the continuation of Letcombe Brook and the Wilts & Berks Canal are all projects or existing assets that are important to Wantage.'

#### Page 34 Paragraph 5.3.1

The plan states, 'The Town Council aspires, finances allowing, to some or all of the following projects

for investment of future Community Infrastructure Levy funding allocated by the local planning authority to the Town Council:

- i. Traffic Management proposals, including the Market Place pedestrianisation and long stay car and coach parking.
- ii. Green Infrastructure Network.
- iii. Cycle ways both within the town and linking Wantage to adjacent areas.
- iv. Community or other projects that may be deemed relevant at the time.

Please see our comments to paragraph 4.0.7, 4.1.3. 4.1.4. We suggest removing the wording 'long stay car' parking.

#### Page 35 Paragraph 5.4.4

The plan states, 'We could consider replacing the surfaces on the roads in the Town Centre to slow traffic and improve road safety. This is, of course, dependent on rerouting through traffic around the Town and strongly supporting the development of the Western Relief Road, which with the Eastern Relief Road and Mably Way, creates an effective route around the Town Centre. As any resurfacing of pavements and roads within the town takes place, we will look at the need for further dropped kerbs to increase accessibility for those less mobile.'

Wantage Western Relief Road is now called Wantage Western Movement Corridor, and the Wantage Eastern Link Road is nearing completion. Any changes to the public highway would need to be approved by Oxfordshire County Council.

#### Page 35 – Transport Management 5.5.1

The plan mentions the nearest rail station being over ten miles away, causing further reliance on cars to travel. Whilst this is acknowledged, Core Policy 19 of VWHLP supports the re-opening of Wantage and Grove Rail Station and aims to do this within the lifespan of both VWHLP and this proposed neighbourhood plan. This should be mentioned within the Neighbourhood Plan to acknowledge the opportunities and benefits this would provide.

#### Page 35 – Transport Management 5.5.2

The plan states, 'Management of transport through the town requires investment in both the Western Relief Road and the Eastern Relief Road. Management of transport within the town requires sufficient provision of car and coach parking, good realm, including lighting, and support of events and activities appropriate to a town centre.'

It is considered that increasing car parking opportunities within the town centre would encourage travel by private vehicle. The Highway Authority would not look to encourage travel into the town centre by private vehicle. Instead, we look to support measures to enable a modal shift to use public transport, cycling and walking in line

with Core Policy 35 (i) of the VWHLP. The neighbourhood plan appears to aspire to relive the congestion within the town centre and, as such, it is not considered increasing car parking capacity within the town centre would achieve this. This objective should be removed from the Neighbourhood Plan.

Please see our comments to paragraph 4.0.7, 4.1.3, 4.1.4

As mentioned previously, Wantage Western Relief Road is now called Wantage Western Movement Corridor, and the Wantage Eastern Link Road is nearing completion. We also recommend rewording the second sentence to put more emphasis on the importance of sustainable transport through improved bus provision, increased cycle parking, accessibility etc.

#### Page 35 - Transport Management 5.5.3

The plan states, 'Support is required to develop an overall transport strategy and business case for infrastructure funding to improve the transport network needed to connect the housing in Wantage and its adjacent villages with the employment centres in the Science Vale to ensure that Wantage remains an attractive place to live and work as defined in the Local Plan.'

The Strategic Active Travel Network (SATN) is a long-term plan for a network of walking and cycling routes across Oxfordshire.

A Local Cycling and Walking Infrastructure Plan (LCWIP) for Wantage and Grove is currently being developed by Oxfordshire County Council.

#### Page 36 – Cycleway and Pedestrian Infrastructure Investments 5.7.1

The plan states, 'Enterprise Partnership and other funding bodies will be required to support the development and implementation of an integrated cycle and pedestrian strategy. We wish to improve accessibility and connections to key locations such as the Town Centre, schools, leisure facilities, green spaces, the major employment centres, neighbouring villages and rail stations as shown in Plan E: Proposed Cycle Routes on page 22. This will include:

- Developing and improving the cycling network by creating more links segregated from heavy traffic, as well as safer and better facilities on the main roads within the town, through the development of a cycling action plan.
- Developing and improving the walking network by creating more direct links and footways where these are missing, widening footways to a standard appropriate to the purpose and demand, and improving the quality of surface materials, landscaping and street furniture, both through the planning application process and through the development of a walking action plan.
- Expanding and maintaining a network of waymarked recreational circular walks.

Please note that Oxfordshire County Council are developing an LCWIP for Wantage and Grove and therefore this will supersede those identified in Plan E.

### **Local Member Views**

## **Local Member Comments**

Cllr Jane Hanna, County Councillor for Grove and Wantage

**Date:** 4/11/2024

**Comment:** I fully support this local plan.

**Cllr Jenny Hannaby**, County Councillor for Grove and Wantage

Date: 4/11/2024

**Comment:** I also support this local plan.